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## Submission on Napier City Proposed District Plan

### Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To:** Napier City Council - Planning Unit

**Date received:** 14/12/2023

**Submission Reference Number #:**250

This is a submission on the following proposed plan (the **proposal**): Napier City Proposed District Plan

**Submitter:**

The Salvation Army Te Ope Whakaora New Zealand, Fiji, Tonga, and Samoa Territory

**Address for service:**

Ana Ika  
The Salvation Army Te Ope Whakaora New Zealand, Fiji, Tonga, and Samoa Territory  
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New Zealand

**Email:** ana.ika@salvationarmy.org.nz

**Attachments:**

TSA Napier Proposed District Plan.pdf

**I wish to be heard:** Yes

**I am willing to present a joint case:** Yes

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- **Yes**

## Submission points

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**Point 250.1**

**Section:** Definitions

**Sub-section:** Definitions

**Provision:**

RESIDENTIAL CARE FACILITY

means the use of land and/or buildings such as an old persons' home, convalescent home, nursing home, rest home, women's or men's refuge, hospital, hostel, or charitable institution in which board and lodging or lodging alone is provided or intended to be provided. This does not include a day care centre, travellers' accommodation, or a retirement complex.

**Sentiment:** Oppose

**Submission:**

1. TSA has not actively participated in local district plan submissions, however, we recognize the paramount importance of housing for the well-being of vulnerable whanau in the community. Understanding the potential impact of the proposed district plan on Napier's housing and consequently on our residential services, we express specific concerns regarding the Residential Care Facility Definition. We anticipate that both existing and future residential services will be categorized as residential care facilities. We propose the removal of "charitable institution" from the definition, as we believe these provisions particularly GRZ-R6 and Consent Processes could hinder our operations and impede our capacity to support the vulnerable whanau in the Napier community.

12. TSA submits on the PDP, specifically focusing on the definition of a "Residential Care Facility" and the proposed rules governing such facilities.

13. The PDP defines "Residential care facility" as "the use of land and/or buildings such as an old persons' home, convalescent home, nursing home, rest home, women's or men's refuge, hospital, hostel, or charitable institution in which board and lodging or lodging alone is provided or intended to be provided. This does not include a day care centre, travellers' accommodation, or a retirement complex."

**Relief sought**

14. TSA proposes the removal of "charitable institution" from the definition of a residential care facility. We hold the belief that these bylaws may pose obstacles to our operations, affecting our ability to support the vulnerable whanau in our community.



**Social Policy &  
Parliamentary Unit**  
Working for the eradication of poverty in New Zealand

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16B Bakerfield Place  
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Attention: Ana Ika



Email: [ana.ika@salvationarmy.org.nz](mailto:ana.ika@salvationarmy.org.nz)

The Salvation Army (**TSA**) makes a submission on the Proposed Napier District Plan (**PDP**) in the **attached** document.

TSA confirms it could not gain an advantage in trade competition through this submission.

TSA would like to be heard in support of its submission. If other submitters make a similar submission, TSA will consider presenting a joint case with them at a hearing.

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Ana Ika – Social Policy Analyst and Advocate

15<sup>th</sup> December 2023

## Summary

1. TSA has not actively participated in local district plan submissions, however, we recognize the paramount importance of housing for the well-being of vulnerable whanau in the community. Understanding the potential impact of the proposed district plan on Napier's housing and consequently on our residential services, we express specific concerns regarding the Residential Care Facility Definition. We anticipate that both existing and future residential services will be categorized as residential care facilities. We propose the removal of "charitable institution" from the definition, as we believe these provisions particularly GRZ-R6 and Consent Processes could hinder our operations and impede our capacity to support the vulnerable whanau in the Napier community.

## Background

2. The mission of TSA is to care for people, transform lives and reform society through God's power. TSA is a Christian church and social services organisation that has worked in New Zealand for one hundred and forty years. It provides a wide range of practical social, community and faith-based services around the country.
3. TSA, registered under the Charities Act 2005 (CC37312), operates as a charitable organisation. The main financial support for TSA comes from donations and fundraising efforts. Although the government contracts some of our services, the payments received often fall short of covering the full costs. Given the essential nature of these services, TSA subsidises the cost to ensure program sustainability.
4. TSA employs almost 2,000 people in New Zealand, and the combined services support around 150,000 people annually. In the year to June 2023, these services included providing around 83,000 food parcels to families and individuals, providing around 5,000 people with short-or long-term housing, some 2,900 families and individuals supported with social work or counselling, over 6,500 people supported to deal with alcohol, drug or gambling addictions, over 3,000 families and individuals helped with budgeting, court and prison chaplains helped 5,000 people.
5. This submission has been prepared by the Social Policy and Parliamentary Unit (SPPU) of TSA in Partnership with Addictions, Supportive Housing and Reintegration Services (ASARS) and Napier Community Ministries. The SPPU works towards the eradication of poverty by encouraging policies and practices that strengthen the social framework of New Zealand. This submission has been approved by Commissioner Mark Campbell, Territorial Commander of TSA's New Zealand Fiji, Tonga, and Samoa Territory.
6. Over the past year, TSA has provided essential services to 690 whanau in Napier. These whanau, comprising 53.2% Māori, 37.7% European, and 2.6% Pasifika, benefit from our Community Ministries, offering food, budgeting assistance, and accommodation support. With roots dating back to 1884 (139 years), our Napier Corps (Church) provides spiritual support and positive lifestyle programs. TSA has a longstanding commitment to addressing the diverse needs of the Napier community.

7. A significant factor affecting the whanau we support is housing instability. Addressing accommodation challenges is pivotal to the well-being and recovery of our whanau. TSA currently operates residential services in Napier, offering transitional housing, and 11 beds for supportive accommodation for individuals reintegrating into society. Our experiences highlight the crucial role safe, affordable, and supportive housing plays in assisting vulnerable whanau and individuals in rebuilding their lives.
8. Here are some of the examples that our team in Napier face on a daily basis
  - a. An individual receiving long-term disability assistance now has a 14-year-old dependent under their care. They are in the process of engaging with a housing navigator to facilitate a transition from temporary housing in a motel to more suitable housing.
  - b. A whanau came to request assistance with food. The whanau currently live in their vehicle. Collaborating with various organizations, we've referred them to Transitional Housing and are also providing support around their budget.
  - c. A person we support recently left their social housing due to domestic violence. She is temporarily staying with a friend while waiting for alternative housing options. She has come to us requesting food support for her family.

These examples underscore the integral role housing plays in the well-being of those we serve. While we offer comprehensive support, housing remains a critical component of the challenges faced by vulnerable whanau.

9. TSA's existing residential programs in Napier, namely Transitional Housing and Reintegration Services, along with any prospective residential services TSA may offer in the future, would fall under the classification of a Residential Care Facility as per the proposed wording of the definition in the PDP. This is despite there being no characteristics, or environmental effects, which suggest they should be classified as anything other than a "residential activity" (and thus regulated differently to residential activities under the PDP). Further, and importantly, Residential Care Facilities are not permitted in every residential zone under the PDP.
10. In theory, TSA would be required to undergo a consent process if any of our services fail to meet the permitted requirements for Residential Care Facilities. However, past experiences with similar regulations in other regions have proven to be challenging, prolonged, and detrimental to our operations. This difficulty arises from a frequent misunderstanding of the work we undertake with vulnerable whanau in the community. As a national operator, we have encountered such instances in different parts of the country, including Hamilton (Transitional Housing) and Christchurch (Reintegration). These restrictions further exclude our whanau and impinge on their rights to accommodation.
11. The individuals and families supported by TSA often grapple with challenges such as food insecurity, financial hardships, housing difficulties, addiction issues, and mental health struggles. Without our assistance and the collaboration of other community organizations, many of our whanau may find themselves navigating complex and formidable hardships, potentially impacting the broader community if left unsupported. TSA extends a helping hand to these families, guiding them towards positive trajectories that, in turn, contribute to the overall well-being of the community. The district plan outlines essential rules and

policies aimed at achieving sustainable management of natural and physical resources, environmental protection, and addressing the social and economic needs of our community. TSA's services, along with those of similar organizations, play a vital role in enhancing the social well-being of the most vulnerable whanau in Napier. It underscores the significance of a collective effort to forge a better future for the entire community of Napier.

### **The Salvation Army's Submission on the Proposed Napier District Plan**

12. TSA submits on the PDP, specifically focusing on the definition of a "Residential Care Facility" and the proposed rules governing such facilities.
13. The PDP defines "Residential care facility" as *"the use of land and/or buildings such as an old persons' home, convalescent home, nursing home, rest home, women's or men's refuge, hospital, hostel, or charitable institution in which board and lodging or lodging alone is provided or intended to be provided. This does not include a day care centre, travellers' accommodation, or a retirement complex."*
14. TSA proposes the removal of "charitable institution" from the definition of a residential care facility. We hold the belief that these bylaws may pose obstacles to our operations, affecting our ability to support the vulnerable whanau in our community.